

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

STEFAN WOODSON,

Plaintiff,

v.

Case No. 3:13CV134

CITY OF RICHMOND, VIRGINIA, *et al.*

Defendants.

**PLAINTIFF'S EXPERT DISCLOSURES
PURSUANT TO FRCP 26(a)(2)**

Plaintiff Stefan Woodson (“Mr. Woodson”), by counsel, hereby discloses the following experts and treating physicians in accordance with Rule 26(a)(2) of the Federal Rules of Civil Procedure. Mr. Woodson is in active treatment. Some or all of the treating physicians listed below may testify at the trial of this matter.

RETAINED EXPERTS

1. **Susan Riddick-Grisham, RN, BA, CCM, CLCP**
Life Care Manager, L.L.C.
3126 West Cary Street, #137
Richmond, VA 23221

See Life Care Plan for Stefan Woodson and Dr. Walker Approval Letter (Exhibit A), Susan Riddick-Grisham CV (Exhibit B), and Susan Riddick-Grisham retainer and invoice (Exhibit C). Mr. Woodson expressly reserves the right to supplement this disclosure as further information becomes available.

2. Marc F. Stern, MD, MPH
Consultant in Correctional Health Care
1100 Surrey Trace Drive, SE
Tumwater, Washington 98501

See Expert Medical Report for Stefan Woodson (Exhibit D), Marc F. Stern CV (Exhibit E), and Marc F. Stern retainer and invoices (Exhibit F). Mr. Woodson expressly reserves the right to supplement this disclosure as further information becomes available.

3. Applied Climatologists, Inc.

Laurence Kalkstein, Ph.D.
896 Banyan Court
Marco Island, FL 34145
\$500 hourly rate

David Sailor, Ph.D.
Department of Mechanical and Materials Engineering
Portland State University
P.O. Box 751
Portland, OR 97207

See Assessment Report by Laurence Kalkstein (Exhibit G), Laurence Kalkstein CV (Exhibit H), David Sailor CV (Exhibit I), Rate Summary and invoices for Kalkstein & Sailor (Exhibit J).

TREATING HEALTH CARE PROFESSIONALS

1. William Walker, MD

MCV Hospital, VCU Health System
PO Box 980677
Richmond, VA 23398

Dr. Walker is a medical doctor who specializes in Physical Medicine and Rehabilitation. He has clinical expertise in Neurologic Rehabilitation and Traumatic Brain Injury. Dr. Walker treated Mr. Woodson following his July 9, 2012 heat stroke. Dr. Walker is expected to testify in conformity with his medical notes, records and reports that have been previously produced, and the records and reports of VCU Health System.

Dr. Walker is expected to testify that Mr. Woodson was admitted to VCU Health System on July 9, 2012 with hyperthermia and altered mental status and registered an internal temperature of 42.5 degree Celsius (108.5 degree Fahrenheit). He is expected to testify that Mr. Woodson's hyperthermia caused Mr. Woodson to develop encephalopathy and multi-organ failure with secondary hypoxic/ischemic brain injury. Dr. Walker is expected to testify that Mr. Woodson came under his care as an inpatient on VCU Health System's brain injury rehabilitation unit from July 24, 2012 through August 30, 2012 (including a brief interruption for transfer back to ICU from August 3, 2012 through August 7, 2012). Dr. Walker is further expected to testify that Mr. Woodson remains under his care following discharge from the hospital for management of his residual impairments, functional deficits, and comorbidities.

Dr. Walker is expected to opine to a reasonable degree of medical probability that Mr. Woodson's primary diagnosis is acquired brain-injury, hypoxic-ischemic type suffered directly as a result of and proximately caused by a heat stroke occurring while Mr. Woodson was confined at the Richmond City Jail.

Dr. Walker is expected to testify that Mr. Woodson's heat stroke also resulted in complications such as aspiration pneumonia and bowel incontinence, DVT, and renal failure. He will further testify that Mr. Woodson continues to suffer from complications such as severe global ataxia, speech dysarthria, urinary incontinence, cognitive deficits, acquired nystagmus, muscle pains, neuropathic foot pain, and insomnia as a result of the heat stroke. Dr. Walker is expected to describe Mr. Woodson's related functional deficits to include dependence on others for instrumental activities of daily living, dependence on a wheelchair for mobility, and that he has a high fall risk when out of his wheelchair. Dr. Walker is expected to testify that these symptoms and deficits are likely permanent, and are a direct result of the subject heat stroke. He

is expected to opine specifically with regard to the duration and nature of Mr. Woodson's heat stroke related disabilities.

Dr. Walker is expected to testify that the Life Care Plan for Stefan Woodson (Exhibit A) is appropriate, medically necessary, and causally related to the subject heat stroke.

Dr. Walker is expected to testify that diagnostic testing, rehabilitation, diagnostics, office visits, surgeries, medications prescribed, and other treatment provided by or at the direction of and/or under the supervision of Dr. Walker were reasonable, necessary, and causally related to Mr. Woodson's July 2012 heat stroke.

All of the opinions that Dr. Walker will provide are expected to be to a reasonable degree of medical probability.

Mr. Woodson expressly reserves the right to supplement this disclosure as further information becomes available.

2. Dr. Harold Green

**Primary Health Associates
2421 Chamberlayne Avenue
P.O. Box 26329
Richmond, VA 23260-6329**

Dr. Green is a medical doctor who has treated Mr. Woodson following his July 9, 2012 heat stroke. Dr. Green also treated Mr. Woodson for many years preceding the July 2012 heat stroke as his primary care physician. Dr. Green is expected to testify in conformity with his medical notes, records and reports, and the records and reports of Primary Health Associates as well any radiology, lab, or other diagnostic tests which he ordered, oversaw and/or reviewed.

Dr. Green is expected to testify that Mr. Woodson suffered a heat stroke as a result of his conditions of confinement in the Richmond City Jail. He is expected to testify that this brain injury resulted in memory and gait problems, ataxia, slurred speech, kidney failure, left facial

weakness, anxiety, depression, foot pain, insomnia, and other complications. He will further testify that while Mr. Woodson previously suffered from high blood pressure, cholesterol, chronic back pain, and heart problems, the symptoms associated with the heat stroke and brain injury are distinguishable. He is expected to differentiate between the physical, cognitive and functional limitations that Mr. Woodson had prior to his heat stroke and subsequent to it. He is further expected to opine with regard to the permanency of Mr. Woodson's heat stroke related disabilities.

Dr. Green is expected to testify that diagnostic testing, office visits, surgeries, medications prescribed, and other treatment provided by or at the direction of Dr. Green were reasonable, necessary, and causally related to Mr. Woodson's July 2012 heat stroke.

All of the opinions that Dr. Green will provide are expected to be to a reasonable degree of medical probability.

Mr. Woodson expressly reserves the right to supplement this disclosure as further information becomes available.

3. Alan Katz, Ph.D.

**NeuroRestorative Virginia
1510 Seneca Drive
Blacksburg, VA 24060**

Dr. Katz is a licensed clinical psychologist and clinical neuropsychologist who has cared for Mr. Woodson during his inpatient rehabilitation at NeuroRestorative Virginia in Blacksburg, Virginia.

Dr. Katz is expected to testify regarding Mr. Woodson's ongoing cognitive, emotional, functional, and physical deficits and complications related to his 2012 heat stroke. Dr. Katz is

expected to testify in conformity with his reports and the records maintained by NeuroRestorative Virginia relative to the care and treatment of Mr. Woodson.

Dr. Katz is expected to opine that Mr. Woodson's symptoms are related to an acquired brain injury he suffered following hyperthermic and anoxic injuries sustained as a result of a heat stroke at the Richmond City Jail. Dr. Katz is expected to opine that Mr. Woodson has awareness deficits, Dysexecutive Syndrome, cognitive disorder, depression and personality disorder with antisocial features as a direct causal result of his 2012 heat stroke.

Dr. Katz is expected to discuss how Mr. Woodson's physical limitations affect his emotional well-being, outlook on his future, goals, and potential to fatigue. He will testify that Mr. Woodson is learning to cope with the possibility that he will never walk again due to his brain injury and resulting physical and neurological limitations. He is expected to testify that Mr. Woodson expresses both sadness over his losses due to the heat stroke, but also hope that he will be able to live a modified life and care for his family in the future. He is expected to testify that Mr. Woodson focuses on his ability to care for his son and daughter, and to perhaps start a screen-printing business in the future, if possible.

Dr. Katz is expected to testify that Mr. Woodson is in denial regarding the connection between his physical deficiencies and his acquired brain injury, and further refuses to accept that he suffered a brain injury at all. Dr. Katz is expected to testify that Mr. Woodson displays irritability when discussing his brain injury.

Dr. Katz is expected to testify that his treatment of Mr. Woodson is directly causally related to his July 2012 heat stroke.

Dr. Katz is expected to offer all of his expert opinions to a reasonable degree of probability based on his expertise in psychology and neuropsychology.

Mr. Woodson expressly reserves the right to supplement this disclosure as further information becomes available.

Respectfully submitted,

STEFAN WOODSON

/S/

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C E R T I F I C A T E

I hereby certify that a true copy of the foregoing was emailed this 20th day of November, 2013 to:

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